

**Environmental Protection Agency
Fiscal Year 2011 Program Review**

for the

**Oklahoma Department of Environmental Quality
Public Water System Supervision (PWSS) Program**

February 13, 2012

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I. INTRODUCTION

Title 40 of the Code of Federal Regulations (40 CFR) Part 142.17 (a)(1) states: At least annually the Administrator shall review, with respect to each State determined to have primary enforcement responsibility, the compliance of the State with the requirements set forth in 40 CFR part 142, subpart B, and the approved State primacy program. This report summarizes the required primacy end-of-year (EOY) review of the Oklahoma Department of Environmental Quality (ODEQ) Public Water Supply Supervision (PWSS) Program by the Environmental Protection Agency (EPA) Region 6 (R6) Source Water Protection Branch, Drinking Water Section.

The ODEQ program elements, which were previously adopted by the State and approved by EPA to meet 40 CFR 142.10 primacy requirements, are examined as well as State activities to meet new primacy requirements and initiatives under the 1996 Amendments to the Safe Drinking Water Act (SDWA). ODEQ's achievements, activities, and shortfalls are highlighted throughout the report.

On Tuesday, November 29, 2011 members of the EPA R6 Drinking Water Section conducted the annual EOY review of ODEQ's PWSS program.

The following people participated in the review:

EPA

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Nichole Foster, Oklahoma Drinking Water State Program Manager

Willie Lane, Chief, Drinking Water Enforcement Section

Dianne Sales, Oklahoma Drinking Water Project Officer

ODEQ

David Pruitt, Environmental Programs Manager, Administration & Tracking Group

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Vicki Reed, Drinking Water State Revolving Fund Program Coordinator

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Steven Hoffman, Brian Schwegal, Don Tullius, Dawn Hoggard, Dave Mercer, Candy Thompson—District Engineers, Public Water Supply Enforcement Section

Sheri McGuire, Lead and Copper Coordinator

David Schmitt, Total Coliform Rule Coordinator

Shawn Brandt, Arsenic, Nitrates, Inorganic Contaminants and Volatile Organic Contaminants Coordinator

Jennifer Alig, Radionuclides Coordinator

Chris Armstrong, Director, State Environmental Laboratory

Jamie Mungle, Safe Drinking Water Information System Coordinator

MistaTurner-Burgess, Environmental Attorney, Legal Counsel
Carl Parrott, Chief Engineer, Water Quality Division
Lynn Martin, Disinfection Byproducts Coordinator
Brad Cook, Capacity Development Coordinator
Chris Wisniewski, Environmental Program Manager, Operator Certification
Section
Ramona Haggins, Administrative Assistant, Public Water Supply Enforcement Section
Matt Pace, Environmental Programs Manager, Environmental Complaints and
Local Services
Mark Hildebrand, Environmental Programs Manager, Water Quality Division
Robert Huber, Environmental Programs Manager, Environmental Complaints and Local
Services

II. SUMMARY OF FINDINGS, RECOMMENDATIONS, & HIGHLIGHTS

The ODEQ PWSS program faces a significant challenge to adopt and implement new drinking water rules under the 1996 SDWA Amendments. EPA R6 wants to continue working with ODEQ to further strengthen the program and meet the challenge of adopting and implementing these new primacy requirements. Highlights noted throughout the report are as follows:

- **Program File Review**—In August 2011, a File Review was conducted on ODEQ's implementation of Federal Regulations. The findings of the review show that ODEQ's current staffing short falls hinder the program in being able to fully implement rules.
Update—Follow-up meeting was conducted shortly after the EOY meeting to review the final draft report and initiate the development of an action plan to address areas of concern. While EPA Region 6 recognizes efforts of the Compliance Tracking Section to develop short, mid, and long term goals to address issues found in the file review report, additional work remains to address these issues.
- **Rule Adoption**
FY11 Summary—Rule adoption extensions for LT2 ESWTR, Stage 2 DBPR, and the GWR have expired.
Summary from FY10 EOY—Regulation adoption remains the overall concern with ODEQ's Drinking Water Program at this time. Underlying this issue are program resource shortages, which if not addressed, will present near and long-term problems for the Drinking Water Program. ODEQ is strongly urged to request rule adoption as soon as possible, given the lengthy approval process required to obtain rule changes for LT2 ESWTR, Stage 2 DBPR, and the GWR.
- **Primacy Packages**—ODEQ is encouraged to submit "draft" primacy revision packages for LT2 ESWTR, Stage 2 DBPR, GWR during the rule change process.
- **Staffing** - EPA R6 strongly advocates that requested positions be authorized and any open positions filled as soon as possible due to requirements of new regulations.
- **SDWIS** - Per GWR implementation discussions, ODEQ committed to providing weekly database extracts to EPA R6. ODEQ's commitment to providing extracts will allow EPA R6 to correctly implement the Stage 2 DBPR, LT2 ESWTR, and the GWR in a timely and complete manner in Oklahoma.

- Tribal Lands - EPA Region 6 Tribal Affairs and Legal is currently in talks with ODEQ Legal regarding regulation authority for tribal PWSs in the state of Oklahoma.

III. PRIMACY REQUIREMENTS

Currently, ODEQ is behind schedule and overdue for submitting a primacy revision package for the Stage 2 DBPR, LT2 ESWTR, and GWR. Primacy revision applications are due two years after a drinking water rule has been promulgated. ODEQ can submit a primacy extension request in lieu of a primacy revision package that will, if approved, give ODEQ two additional years to adopt the rule. ODEQ previously submitted and was approved for three primacy extension requests: the Stage 2 DBPR, LT2 ESWTR, and GWR. At this time, the primacy extension deadlines for these three Rules have expired.

Rule	Promulgation Date	Primacy Extension Expiration Date
Stage 2 DBPR	January 4, 2006	January 4, 2010 (expired)
LT2 ESWTR	January 5, 2006	January 5, 2010 (expired)
GWR	November 8, 2006	November 8, 2010 (expired)

ODEQ must note that under PWSS grant agreements, EPA requires ODEQ to maintain primacy for the State's PWSS program. One of the major requirements to maintaining primacy is for the State to adopt drinking water regulations which are no less stringent than the National Primary Drinking Water Regulations (NPDWRs)(see Attachment A). Prior to FY 2010, Oklahoma had adopted the NPDWRs by reference, promulgated by the EPA. At this time, Oklahoma continues to be behind schedule with adoption of the three following NPDWRs:

- Long Term 2 Enhanced Surface Water Treatment Rule (LT2 ESWTR)
- Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR)
- Ground Water Rule (GWR)

Failing to adopt and implement these rules, ODEQ PWSS primacy retention is in jeopardy. EPA Region 6 requests ODEQ draft rule language and submit draft primacy revision packages for LT2 ESWTR, Stage 2 DBPR and GWR.

IV. RULE ADOPTION AND RULE IMPLEMENTATION

EPA R6 recognizes that the ODEQ PWSS program faces a significant challenge and an increased workload to adopt and implement drinking water rules under the 1996 SDWA Amendments. EPA R6 wants to continue to work with the State to further strengthen the program and meet the challenge of adopting and implementing new primacy requirements.

Currently the Water Quality Division (WQD) is seeking a proposed fee increase for the PWSS program. The proposal is in the process of being approved by the Water Quality Council and if approved will be presented to the Environmental Quality Board (EQB) for recommendation to request state approval. It should be noted that modified procedures were adopted last year by the Legislature that will require action on all new rules related

to a fee increase, where inaction will result in non-approval. With the fee increase, the WQD would be in a better position to fill current vacancies and better able to seek rule adoption, for LT2 ESWTR, Stage 2 DBPR, and the GWR.

[As of February 1, 2012, the proposed fee increase has been approved by the Water Quality Management Advisory Council and will be presented to the Environmental Quality Board at the February 24 meeting. However, EPA is concerned with recent statements suggesting that the fee increase would not lead to the adoption of LT2ESWTR, Stage 2 DBPR, and GWR. From past meetings, EPA Region 6 was informed the fee increase would allow ODEQ to begin seeking primacy for the new rules. Please note that regardless of how resources and funds are procured, new rules and regulations, for which primacy extensions have already expired, should be adopted in a timely manner.]

Given the uncertainty of the proposed fee increase, ODEQ stated that they do not wish to drain resources on drafting the needed materials for rule adoption until it is certain funding will be available. As the process for rule adoption can be a lengthy process, failing to draft materials indicates that ODEQ would be unable to start the process for seeking primacy until after July 1, 2013. While adoption of new rules is a major concern, it is important to recognize that an August 2011 File Review uncovered implementation backsliding for many existing rules that ODEQ had previously adopted.

A. GROUND WATER RULE

ODEQ submitted a primacy extension request for the Ground Water Rule (GWR) on October 31, 2008, however that request has since expired (Nov. 8, 2010). ODEQ cited a lack of resources necessary to implement the GWR as the reason for the extension request. ODEQ had submitted requests to their legislature for additional positions (FTE) but the requests were denied due to legislative caps. The GWR became effective for systems on December 1, 2009. Since ODEQ was unable to adopt the GWR, EPA R6 has had oversight and implementation responsibilities for the rule in Oklahoma since December 2009. ODEQ has been collaborating with EPA R6 to assist with partial implementation of the Rule where the State already has legal authority under state regulations for these requirements.

EPA R6 continues to implement the GWR on behalf of ODEQ. Current EPA R6 activities include, conducting 4-log evaluations, when requested, *E. coli* investigative site visits, follow up on corrective actions imposed on systems because of an *E. coli* site visit, training workshops and compliance determination for triggered source monitoring, monthly operating report (MOR) submissions for 4-log, and Public Notification. In addition to the activities listed above, EPA R6 conducts calls with ODEQ staff to communicate the status of systems affected by the GWR.

B. STAGE 1 AND STAGE 2 DISINFECTANTS AND DISINFECTION BYPRODUCTS RULE

ODEQ received approval from EPA R6 for a two-year primacy extension for the Stage 2 Disinfectants and Disinfection Byproducts Rule (DBPR2) on December 17, 2007. ODEQ's deadline to submit a primacy package was January 4, 2010. ODEQ is 22 months

overdue in submitting this primacy package as of the time the End of Year review was conducted.

Stage 1 DBPR: Stage 1 DBPR MCL compliance and compliance with DBP monitoring continues to be of concern for Oklahoma. For FY2011, approximately 400 MCL violations were issued with 62 NOV's sent between July 1, 2010 and June 30, 2011. Currently, ODEQ has 65 open Consent Orders that relate to the Stage 1 DBPR. For the last year, ODEQ has worked to bring systems into compliance with the Stage 1 DBPR, resulting in a number of Orders and NOV's having been closed.

In order for EPA R6 to prepare the Stage 2 DBPR Initial Distribution System Evaluation (IDSE) report on behalf of Oklahoma water systems, EPA R6 needs the Oklahoma laboratory to continue reporting the Stage 1 DBPR and Stage 2 IDSE sample results electronically in XML format by the 21st day of the following month. (Example: The lab should report the results for DBP samples collected in November by December 21st). EPA R6 recommends the ODEQ lab, via the PWS Compliance Tracking section, continue to provide complete and timely DBP results in the appropriate electronic format to Nichole Foster of EPA R6 by the 21st of the month.

Because EPA R6 is directly implementing the Stage 2 DBPR, LT2 ESWTR, and GWR for Oklahoma, it is especially important the State provides EPA R6 with continuous updates of a copy of the ODEQ SDWIS database, which includes water system inventory, sample schedule, and sample result information. Per discussion on implementation of the GWR between ODEQ and EPA R6, ODEQ committed to providing weekly database extracts to EPA R6 beginning calendar year 2010. ODEQ's commitment of providing updates will allow EPA R6 to correctly implement these rules in a timely and complete manner in Oklahoma.

Stage 2 DBPR: There are 475 systems required to comply with the Stage 2 DBPR IDSE standard monitoring. Of these, 466 systems (98%) have completed IDSE standard monitoring as of December 12, 2011. EPA R6 credits the laboratories' and Steven Wright's efforts in submitting the data electronically in the proper format to allow EPA R6 to complete Stage 2 IDSE reports on behalf of respective systems. It should be noted that ODEQ's inventory affects the universe of systems applicable to the Stage 2 DBPR.

In total, 1134 Oklahoma water systems must comply with the Stage 2 DBPR. These systems must submit a Stage 2 DBPR compliance monitoring plan before beginning compliance monitoring in the year 2012 or 2013. There are 600 systems (or 53%) that have a Stage 2 DBPR compliance monitoring plan. (The 600 systems include the 466 water systems that have a completed Stage 2 DBPR IDSE standard monitoring plan and have an IDSE Report on file).

Summary of Stage 2 DBPR Compliance

DBP2 Classification	# of Systems with an IDSE Report	# of IDSE Exempt Systems with a Stage 2 DBPR Compliance Monitoring Plan	TOTAL # of Systems with a Stage 2 DBPR Compliance Monitoring Plan
Schedule 1	78 of 79	36 of 51	114
Schedule 2	40 of 40	15 of 20	55
Schedule 3	112 of 113	53 of 82	165
Schedule 4	236 of 243	30 of 506	266
TOTAL	466 of 475	134 of 659	600
* The IDSE Report is equivalent to the Stage 2 DBPR Compliance Monitoring Plan			

Changes that could impact PWSs related to DBPs is the proposed change to State Administrative Code 252:631-3-3(c)(2) of free chlorine residuals being reduced from the current standard of 1 milligram per liter at the point of entry into distribution to 0.2. EPA will be interested to see if this reduction will impact disinfection byproduct levels and coliform detection in the state.

C. LONG TERM 1 AND LONG TERM 2 ENHANCED SURFACE WATER TREATMENT RULE

LT1 ESWTR: Promulgated by EPA in January 2002, the Long Term 1 (LT1) Enhanced Surface Water Treatment Rule (ESWTR) built upon the requirements of the 1989 Surface Water Treatment Rule and is the smaller system counterpart of the Interim Enhanced Surface Water Treatment Rule. ODEQ has been implementing this rule since September 2003 when final primacy was received.

LT2 ESWTR: The State received approval from EPA Region 6 for a two-year primacy extension on December 17, 2007 for the Long Term 2 (LT2) ESWTR. The primacy package for LT2 was due by January 5, 2010. EPA Region 6 continues to have implementation and enforcement responsibility for LT2.

As a carryover from last year, EPA Region 6 still requests that ODEQ make monthly removal-credit determinations and approvals for treatment processes already in place.

There are 200 Oklahoma water systems that are required to comply with the LT2 ESWTR. Of these, there are 170 small water systems serving fewer than 10,000 persons that were required to conduct an initial round of source water monitoring for *E. coli* enumeration every 2 weeks for a one-year period. After completion, EPA initially determined that 62 small water systems had an average *E. coli* result that exceeded the regulatory maximum allowable average trigger level (either 10 coliforms/100 mL for lakes/reservoirs as sources or 50 coliforms/100 mL for flowing streams/rivers).

However, on February 4, 2010, EPA HQ issued a memorandum and guidance that found an alternative trigger level of 100 coliforms per 100 mL for both types of surface water sources could be used at the discretion of primacy agencies. All 62 water systems that had been sent notification letters requiring triggered-monitoring for *Cryptosporidium*

were called and advised to delay any plans for the additional monitoring until receiving further written notification from EPA R6.

Based on the alternative trigger level of 100 coliforms per 100 mL in the guidance issued in February 2010, the number of schedule 4 systems that were initially required to monitor for *Cryptosporidium* has been reduced to 16.

PWS-ID	PWS Name	County
OK1021770	Adair Co RWD #5	Adair
OK1221637	Cherokee Co RWD #11	Cherokee
OK1021620	Hulbert PWA	Cherokee
OK1021689	Eucha Lake WTP	Delaware
OK1020101	Heavener Utility Auth - PSG	Leflore
OK1021666	Mayes Co RWD # 6	Mayes
OK1221610	Spring Park Development Water System	Mayes
OK1010203	Idabel Public Works Authority	McCurtain
OK1010207	McCurtain Co RWD #8 (Mt. Fork Water)	McCurtain
OK1021502	Delaware	Nowata
OK1021503	Nowata Water System	Nowata
OK1021410	Osage Co RWD #20 (Hulah)	Osage
OK1021301	Pawhuska Water System	Osage
OK1010318	Pushmataha Co RWD #3	Pushmataha
OK1020212	Roland Water System	Sequoyah
OK1021527	Wagoner Co RWD # 9	Wagoner

Of the larger systems serving populations greater than 10,000 people, four water systems are required to provide additional treatment for *Crypto* removal. All were on monitoring schedule 3 (serving populations between 10,000 and 50,000 people). These additional treatment requirements are to be in place no later than September 1, 2013 for these systems.

PWS-ID	PWS Name	Bin Concentration	Bin Level	Crypto Treatment Requirement
OK1020419	CREEK CO RWD # 1	0.223 oocysts/L	2	additional 1-log removal
OK1010601	DURANT	1.634 oocysts/L	3	additional 2-log removal
OK1021701	TAHLEQUAH PWA	0.175 oocysts/L	2	additional 1-log removal
OK1021529	WAGONER CO RWD # 4	0.115 oocysts/L	2	additional 1-log removal

ODEQ to assist the EPA Region 6 when site visits are needed at systems with elevated levels of *Cryptosporidium*.

For only these 4 water systems, in either Bin 2 or 3, EPA Region 6 has requested that ODEQ make monthly removal-credit determinations and approvals for treatment processes already in place. EPA primarily is looking for 1-log CT credit for the use of chlorine dioxide at 1 water system, the approval of 0.5-log removal credit for a pre-sedimentation basin at another water system and 1-log removal credit for meeting individual (IFE) and combined filter effluent (CFE) turbidities of less than 0.15 NTU 95% of the time each month at all 4 water systems. These additional removal credits will provide the needed treatment required under the LT2 ESWTR. This additional workload is small, and EPA recommends the State assume these responsibilities with existing staff.

D. CHEMICAL MONITORING (PHASE I, II/V) RULES

ODEQ is revising the chemical monitoring waiver packet that PWSs would complete to seek reduced monitoring under IOCs/SOCs and VOCs. Comments have been made by EPA Region 6 on a draft packet. Those comments have been incorporated into a new packet. At issue had been a nitrite waiver for systems that chlorinate. However, the issue has been resolved and ODEQ will submit a packet to EPA Region 6 for final review.

ODEQ Action: Submit final packet for approval

EPA Follow-up action: At the time of compiling this report, the packet has been submitted to EPA Region 6 and is in the process of being approved.

Radionuclides: A recent spike in gross alpha and uranium MCL violations has been seen throughout the state, resulting in a need for additional enforcement work.

Inorganic Contaminants (IOCs): ODEQ continues to meet all IOC monitoring requirements. During FY2011, arsenic MCL violations increased slightly, with 13 entry points on increased monitoring. Nitrate violations continue to be an area addressed by Compliance Tracking staff. Currently 62 entry points are on quarterly sampling with 17 PWSs exceeding the MCL for nitrate.

Volatile Organic Contaminants (VOCs): Ongoing work has been completed with VOC sampling to include 70 entry points now on quarterly sampling, including new sources. In addition to ongoing sampling efforts, two PWSs with VOC issues are expected to be in compliance within the next few months.

Worth noting is the work and effort demonstrated in sending reminder notices to systems on sampling and completing public notification. These efforts help keep PWSs in compliance and eliminated the need for assistance from enforcement and/or legal.

E. VARIANCES AND EXEMPTIONS RULE

The Variances and Exemptions (V&E) Rule was revised in August 1998, in accordance with the 1996 Safe Drinking Water Act Amendments. ODEQ has not allowed V&Es in the past, nor is considering them at this time.

F. SURFACE WATER TREATMENT RULE

The Surface Water Treatment Rule (SWTR) required that ground water under the influence of surface water (GU) determinations for community water systems be completed June 29, 1994, and non-community water systems be completed by June 29, 1999. All GU determinations were completed on time.

G. INTERIM ENHANCED SURFACE WATER TREATMENT RULE

The required disinfection profiling for water systems in each district is the responsibility of each individual district engineer (DE). In general, Oklahoma Public Water Systems do not have a problem meeting the turbidity standard or the individual filter monitoring requirement.

ODEQ is experiencing a vacancy in their SWTR/IESWTR rule coordinator position and splitting the workload between staff members, which has led to delayed compliance determinations. ODEQ is aware of the need to conduct these determinations in a timely fashion. In an effort to increase efficiency, an electronic MOR application has been developed, however, due to a lack of consistency with PWSs completing the form, manual data entry is still necessary.

H. TOTAL COLIFORM RULE

ODEQ continues to meet monitoring determination requirements under TCR. During the August 2011 File Review, a few discrepancies were noted regarding sampling requirements for populations great than 4,900 regularly taking all TCR samples on the same day and systems not taking five required routine samples in the month following a total coliform positive. These discrepancies were discussed during the December 1, 2011 meeting.

I. LEAD AND COPPER RULE

Efforts are being increased on proper sampling sites and schedules for lead and copper monitoring. Trends are showing an increase in lead exceedances, which are being addressed through compliance orders. Consecutive connection system sampling will be phased in starting in 2012.

J. CONSUMER CONFIDENCE REPORTS

The Consumer Confidence Report (CCR) is considered a low priority in the ODEQ PWSS program, which explains why there are low compliance numbers with this requirement. The district engineers previously assisted systems with CCRs, but with the increased workload, they have not been able to offer systems the same level of technical assistance as in the past. ODEQ has set up automated compliance tracking systems in SDWIS and this should facilitate improved compliance tracking for the CCR regulation.

K. PUBLIC NOTIFICATION

The Public Notification (PN) Rule was reviewed as part of the August 2011 file review. As noted in the review report, EPA Region 6 has concern with the lack of PN violations being assigned by ODEQ. In addition, timeliness of Tier 1 and Tier 2 PN requests for TCR and ESWTR MCL and TT violations is a concern of EPA.

V. GENERAL - OTHER AREAS OF DISCUSSION

A. STAFFING

The ODEQ Water Quality Division is organized such that four intermediate level management positions, under the direction of the Division Director, manage multiple sections. Appendix F shows the organizational structure of the ODEQ Water Quality Division along with the District Engineering assignments. The Public Water Supply (PWS) Compliance Tracking, and Wastewater Compliance Tracking Sections are supervised by the Compliance Tracking Manager. The PWS Enforcement, Industrial Wastewater Enforcement, and Municipal Wastewater Enforcement Sections are supervised by the Enforcement Group Manager. The Drinking Water State Revolving Fund (DWSRF) program, Construction Permitting, and Operator Certification Sections are supervised by the Construction and Operation Group Manager. The Discharge Permitting Group Manager does not oversee any sections with PWSS Program responsibilities.

Prior to 2009, the PWS Enforcement Section was broken into ten districts with an engineer responsible for each district. However, July 1, 2009, one of the 10 district engineer positions was transferred to the DWSRF Section to assist with American Recovery and Reinvest Act (ARRA) duties so that there are currently only nine positions to cover the ten districts. Since then, vacancies have occurred in three additional positions within the Enforcement Section and these have not been filled. This reduction in staff has led to a heavy burden on the remaining members, given that the amount of work, technical assistance, and responsibilities has increased. According to ODEQ, the PWS Enforcement section continues to operate at 60% staffing levels. ODEQ will continue to struggle with the current workload, as there are not enough positions or staff to complete all work.

The PWS Compliance Tracking section has 9 positions with one administrative assistant position. Only 70% of those positions are staffed at this time. ODEQ continues to face restrictions on filling vacancies and acquiring much needed resources. ODEQ provided EPA R6 with the current ODEQ Water Quality Division organizational chart. EPA R6 strongly recommends that requested positions be authorized and filled due to the requirements of new regulations.

In addition to staffing and resource challenges, ODEQ could face information technology (IT) restrictions under new policy and procedures set by the Office of State Finance. These restrictions would affect a wide range of IT activities including software purchases and installations, programming changes to software, managing servers, contracts on serving laboratory equipment, etc. EPA is concerned that these changes could negatively impact the WQD's ability to carry out daily activities.

B. LABORATORY CAPACITY

The ODEQ State Environmental Laboratory (SEL) is certified to analyze most of the primary regulated contaminants, but not all. SEL contracts some radiochemical and some synthetic organic chemical (SOC) analyses to outside labs. The lab continues to face challenges meeting workload demands. Upcoming DBPR2 samples will be a concern for

SEL, in terms of planning and administrative support. EPA R6 met December 1, 2011, to discuss this issue and better understand the current estimated numbers of DBPR2 sampling.

SEL continues to work on the phase implementation of a new Laboratory Information Management System (LIMS). The microbiology portion of the system is now on-line with nitrate and nitrite scheduled next. In an effort to better support the new LIMS, analytical staff is being pulled into the development stages. By bringing in these staff members, the lab will be able to utilize the customization ability of the new LIMS and build a sustainable system. ODEQ emphasized that a great deal of time will be required in preparation of full implementation of the new LIMS.

In addition to direct PWSS sampling, it should be noted that during the summer of 2011, SEL was inundated with Blue-Green algae and other toxic algae blooms in water bodies throughout the state. Informational material was developed to help PWSs sample for water quality related to these algae blooms.

C. TRIBAL LANDS

In the past, EPA Region 6 and ODEQ have shared authority for regulating tribal systems in Oklahoma. ODEQ treats all Tribes as citizens of Oklahoma and regulates all systems, unless the Tribe made an official request to be regulated by EPA Region 6. Some tribes have selected to allow regulation by ODEQ. Recently, EPA Region 6 Legal and Tribe Affairs Divisions have determined that this option cannot be given to tribes. ODEQ's legal department is awaiting a letter from EPA Region 6, providing information regarding the systems in question.

VI. OTHER PWSS PROGRAM INITIATIVES and STATUTORY REQUIREMENTS

On August 6, 1996, the SDWA Amendments of 1996 were signed into law. This section of the report covers Oklahoma's achievements in implementing the activities contained in the 1996 SDWA Amendments.

A. CAPACITY DEVELOPMENT

ODEQ's new Capacity Development Strategy has been drafted and is in the review process. The new strategy takes into account sustainable infrastructure and the new Enforcement Targeting Tool (ETT) and policy. The Engineering Planning and Design Grant that was started approximately two (2) years ago for small systems has had limited success. Currently, only two (2) of the 16 projects receiving funding have spent all monies received. All grants have been extended until May 31, 2012 to allow more systems to complete tasks which are grant eligible. EPA Region 6 has learned the Capacity Development Coordinator will soon be retiring. The region requests that ODEQ work with Amy Camacho, the Drinking Water Capacity Development Coordinator at Region 6, regarding strategy development and inform her of Capacity Development Coordinator staffing changes.

B. OPERATOR CERTIFICATION

Recent efforts under operator certification include providing targeted training for DBP violators at Rose State College. In addition to this targeted training, Rose State College is offering additional courses related to DBPs and methods to control them. ODEQ anticipates seeing positive results from these training sessions. While efforts continue to be made with ODEQ's Operator Certification program, staff resources are starting to become a concern for the program.

C. SOURCE WATER PROTECTION

The Oklahoma Department of Environmental Quality's Source Water Assessment program, as required by Section 1453 of the Safe Drinking Water Act amendments of 1996, was initially developed, implemented and administered by ODEQ's Water Quality Division. Upon completion of its assessment of all public water supply systems in the state, the Water Quality Division relinquished implementation responsibility for the state's Wellhead Protection program – the state's protection program for ground water sources of public drinking water supplies – to the Environmental Complaints and Local Services (ECLS) Division. Responsibility and funding for protecting surface water sources of public drinking water supplies remains with the Water Quality Division.

The focus has been on three areas for source water protection: sustainable implementation of the program, public education, and Environmental Complaints hotline. Under sustainable implementation, PWSs have been revisited and plans updated to reflect any changes. Quarterly newsletters are being sent to spread the word about available tools and outreach opportunities. While the hotline does not have a direct link to source water protection, GPS views are used to determine whether reported spills pose a threat to PWSs in the area.

D. AREA WIDE OPTIMIZATION PROGRAM (AWOP)

In FY11, the ODEQ continued its drinking water AWOP program. A moratorium on out-of-state travel prevented Steven Hoffman from attending the quarterly meetings in person. Mr. Hoffman attended the meetings via video teleconference (VTC) and was an active participant. Although we are pleased with Mr. Hoffman's ability to actively participate via VTC, we hope he will be able to attend future meetings in person, to gain more from the training workshop components of the meetings. Please note that workshop components that take place within water systems are not available via VTC.

In November 2010, ODEQ hosted a multi-state CPE in Durant, OK. This effort took quite a bit of planning and was appreciated by the other R6 AWOP states.

Also in FY 2011, the ODEQ optimization team continued efforts to introduce PWSs to performance based training methods, including selecting chlorination points, running jar tests, etc. ODEQ is commended for the continual support and participation of AWOP initiatives in an effort to optimize drinking water system performance.

E. DISTRICT ENGINEER HIGHLIGHTS

While overall PWSS implementation has been hampered, due to resource shortfalls, some individual work being done by staff continues to yield positive results in helping public water systems comply with state and Federal regulations. Highlighted success stories were presented in the meeting and demonstrated the high caliber of work being done. Each of these cases shows the effort and level of commitment it takes from staff to help PWSs achieve compliance.

Okarche- Unapproved Pipe Replacement Effort

- Since 2007 seven miles of pipe have been replaced for the last five years to remove “gray pipe” leaching vinyl chloride into the water supply.
- Quarterly sampling at five monitoring sites has been conducted to monitor the replacement progress on reducing the levels of vinyl chloride. Fourth quarter results for 2011 show non-detect levels at all five sites.

Mycoland MHP- Well with high nitrates and continuous total coliform issues

- System on Boil water notice.
- District engineer has worked to facilitate negotiations for the neighboring water system of McCord to establish water distribution to the RV park.

Weatherford-30 wells with high arsenic

- Worked on pilot program with Sandia National Laboratory for treatment process.
- First treatment plant online and reducing arsenic levels to between four to five parts per billion.
- Second plant set to come online in the next 45 days.

Unnamed PWS-Criminal investigation on falsified MOR submissions and questionable turbidity reporting

- Robust CID and district engineer work to bring violator to justice through on-site investigations.

Okmulgee-Compliance Issues

- District Engineer worked with operators to use Performance Based Training to help with compliance issues while a treatment plant was under construction.
- Applications of principles help the PWS achieve compliance before the new treatment was even finished.

Fidlers Bend-PWS Requirements

- Continues to show the struggles staff faced with PWSs that refuse to comply with regulations.
- Case where everyone has shown persistent effort to serve the operator with notices of violations for monitoring and well construction standard violations.

F. WATER SECURITY

ODEQ developed a Water/Wastewater Agency Response Network (WARN) for Oklahoma, called SoonerWARN. SoonerWARN is a computerized tracking system that

addresses mutual aid during an emergency. It works by matching personnel with the necessary tools and equipment to both assess and assist the affected water/wastewater system as quickly as possible until a permanent solution is found. Originally, many potential SoonerWARN participants had liability concerns. The Oklahoma Legislature passed a Bill to clarify that all public systems are part of the SoonerWARN and all partners would have liability protection. The Bill did not cover private utilities. ODEQ has since developed contracts where public entities as well as private entities can share equipment and have liability protection. As of the EOY meeting, there are over 80 utilities currently enrolled in SoonerWARN. Some systems, such as Tulsa, have their own mutual aid network set up with nearby water systems, so they may not be inclined to join SoonerWARN. ODEQ is hosting the SoonerWARN website and Monty Elder, the Emergency Response Coordinator for ODEQ, is coordinating the effort to bring in more utilities.

ODEQ once again hosted a one-day conference outlining the SoonerWARN program. Included in this year's conference was a tornado scenario workshop, designed to enhance the ability of utility personnel and stakeholders to effectively prepare for, manage, and respond to water infrastructure consequences resulting from a severe tornado incident. EPA R6 encourages ODEQ to contact the EPA R6 Water Security Coordinator, Dawn Ison, should the State have any future questions or concerns.

G. SANITARY SURVEYS

Under the IESWTR and LT1, sanitary surveys are required for all surface water systems and all systems under the direct influence of surface water. The GWR, which became effective December 1, 2009, also requires sanitary surveys for all ground water systems. Thus, sanitary surveys will be required every 3 and 5 years for all community and non-community systems, respectively. ODEQ surpasses sanitary survey inspection frequency requirements for community water systems by surveying surface water systems four times per year, ground water systems two times per year, and purchase systems once per year. The Environmental Complaints and Local Services (ECLS) Division staff conducts the surveys. If a deficiency is noted during the survey, ECLS staff will follow-up with the system within 15 days. If the deficiency still is not corrected, ECLS will contact the District Engineer (DE). The DE will attempt to address the issue informally prior to formal enforcement action being taken.

ODEQ purchased approximately 30 tablet PCs and software that enabled inspectors to use State developed electronic input forms for sanitary surveys in 2010. ECLS uses a standardized InfoPath sanitary survey form that includes most of the essential elements outlined in the IESWTR and GWR. The need for data entry once the inspector returned to the ODEQ office has been removed with the use of the new sanitary survey form which migrates information directly into SDWIS. During the August 2011 File Review it was noted that the pump category has been left off some forms, the discrepancy was noted and ODEQ will be revising the forms to include pump questions. Also noted during the file review is the practice of ECLS visiting systems and performing sanitary surveys in segments. As a result, each visit shows only two or three of the eight required elements reviewed, but the visit was recorded in SDWIS as a sanitary survey. This

segmented approach looks to be causing incomplete sanitary surveys, as not all eight elements are being reviewed. Additionally, the recent file review found that pump station assessments, one of the required eight elements of a complete sanitary survey, were not being conducted. ODEQ must include pump station assessments in sanitary survey inspections and should upgrade to SDWIS 3.0, which allows partial surveys to be documented and later grouped into a packet of visits for all eight required elements.

H. DATA REPORTING

In September 1999, ODEQ adopted SDWIS/STATE as their official drinking water database for reporting and is still working hard to fully implement the system. ODEQ has already implemented SDWIS Web Release 1 (SWR1) and migrated to SDWIS Web Release 2 (SWR2) in August 2009. During 2010, ODEQ installed the newest update to SDWIS Web Release 2.3 (SWR2.3) and continues to use the support tools of Lab to State and XML sampling. Currently ODEQ is testing out the latest version of SDWIS Web Release 3.0 and hopes to move forward with implementation in the near future.

Currently, ODEQ has one staff member dedicated to inventory completeness. ODEQ continues efforts to clean up inventory data to ensure data submitted to SDWIS/FED is as accurate as possible. In particular, ODEQ has given special attention to the administrative contact information and population of all water systems. Annually, ODEQ sends a letter to systems showing the system's inventory and sample schedule, requesting the system update the information if needed. Inventory data is also updated after sanitary surveys. In the past, ODEQ used historical records to send letters to systems indicating they have not updated their system's population within the last five years.

House Bill 1059 may impact the PWSS program by possibly increasing inventory numbers. Under the proposed bill, emphasis is placed on restaurants, churches, day care facilities, and other similar types of business to be issued a permit to supply water. The construction and sample results for these systems will be reviewed prior to issuance of the permit to supply.

During the week of August 8, 2011, a File Review was conducted at ODEQ's central office. The review helped pin-point areas needing attention, to prevent program backsliding.

EPA Requests: The development of an action plan to address areas of concern in the report that could impact ODEQ's ability to implement the PWSS program and protect public health.

ODEQ Response: During a follow up meeting with ODEQ on December 1, 2011, the state provided a list of findings from the report that will be reviewed and evaluated for solutions.

ODEQ continues to move forward with electronic documents and records with the use of Edoctus. During the August File Review the review team was able to retrieve

information from the system. Electronic reporting and record keeping should afford ODEQ resources savings.

VII. FUNDING MECHANISMS

A. PUBLIC WATER SUPPLY SUPERVISION GRANT PROGRAM

In FY 2011, ODEQ was awarded the FY 2011 PWSS grant allotment of \$1,417,000 in a total of four increments. The tentative 2012 PWSS allocation is \$1,417,000. This is for planning purposes, since EPA R6 does not know if that amount will be reduced in the final budget. Final allocations are typically received any time between October and February. As a reminder, the allotments can change from year to year based on the data that the State enters into SDWIS by December every year. The allotment formulas are based on population (20%), geographical area (10%), the number of community and non-transient non-community water systems (56%), and the number of transient non-community water systems (14%). EPA R6 awarded \$463,903 on 7/20/11 for the first portion of the FY2012 award offer. EPA R6 awarded an additional \$334,792 portion of the grant in December 2011, similar to how the award was made in increments in FY2011.

The Quality Assurance requirements for ODEQ's PWSS program are current as of the EOY meeting with ODEQ, however the current approved Quality Management Plan (QMP) will expire November 14, 2012. The Quality Assurance Project Plan (QAPP) expired on February 5, 2012. A 30-day extension has been granted to ODEQ. EPA R6 requests that the revised plan be submitted by March 5, 2012 for review and approval.

B. DRINKING WATER STATE REVOLVING FUND PROGRAM SET-ASIDE FUNDING

Section 1452 of the SDWA authorizes EPA to enter into agreements with eligible States to make capitalization grants to further the health protection objectives of the SDWA. During FY2011, ODEQ requested, and received, funding for all available DWSRF set-asides, including the 4% DWSRF Administrative Set-aside; the 2% Small System Technical Assistance Set-aside; the 10% State Program Management Set-aside (which requires a 1:1 match); and the 15% Local Assistance Set-aside (for Wellhead Protection, Capacity Development, and Engineering, Planning and Design Grants).

ODEQ does an excellent job in managing their set-asides by routinely moving any unexpended set-asides into the loan fund so that more infrastructure projects can utilize the funds, thereby eliminating any "Unliquidated Obligations."

VIII. Conclusion

The ODEQ PWSS program must address rule adoption and implementation in order to retain primacy authority. Adoption of the LT2 ESWTR, Stage 2 DBPR, and GWR should occur regardless of how resources and funds are procured. EPA Region 6 advises ODEQ to improve efficiency and seek authority to fill any open staff positions. The Region will continue to assist ODEQ where possible to address concerns found during the file review.

ATTACHMENT A – 40 CFR 142.10 Primacy Requirements

Regulations specified in 40 CFR 142.10 require states that have been delegated primary enforcement authority (primacy) for the Safe Drinking Water Act to meet the following requirements:

1. Adopt drinking water regulations which are no less stringent than the national primary drinking water regulations (NPDWRs);
2. Adopt and implement adequate procedures for enforcement of such State regulations;
3. Maintain an inventory of public water systems;
4. Develop a systematic program for conducting sanitary surveys of public water systems in the State;
5. Establish and maintain a State program for the certification of laboratories conducting analytical measurements of drinking water contaminants;
6. Assure the availability to the State of laboratory facilities certified by the Administrator and capable of performing analytical measurements of all contaminants specified in the State primary drinking water regulations;
7. Establish and maintain an activity to assure that the design and construction of new or substantially modified public water system facilities will be capable of compliance with the State primary drinking water regulations;
8. Have authority to apply State primary drinking water regulations to all public water systems in the State;
9. Have authority to sue in courts of competent jurisdiction to enjoin any threatened or continuing violation of the State primary drinking water regulations;
10. Have right of entry and inspection of public water systems;
11. Have authority to require suppliers of water to keep appropriate records and make appropriate reports to the State;
12. Have authority to require public water systems to give public notice that is no less stringent than EPA requirements in 40 CFR 142.32 and 142.16(a);
13. Have authority to assess civil or criminal penalties for violation of the State's primary drinking water regulations and public notice requirements;
14. Have authority to require community water systems to provide consumer confidence reports as required under 40 CFR part 141, subpart O;
15. Establish and maintain record keeping and reporting of its activities, including quarterly reports to the Administrator (Safe Drinking Water Information System) of violations, enforcement actions, notification of any variances and exemptions, and water system inventory information from the previous quarter;
16. If the State permits variances or exemptions, or both, from the requirements of the State primary drinking water regulations, the State shall do so under conditions and in a manner no less stringent than federal requirements;
17. Adopt and implement an adequate plan for the provision of safe drinking water under emergency circumstances;
18. Have authority for assessing administrative penalties.

ATTACHMENT B –Primacy Revision & Program Update For Oklahoma

(Revised 11/15/10)	State Adoption		Final Primacy Revision Application		Final EPA Approval	
Rule	Status	Date	Status	Date	Status	Date
IESWTR	Adopted	6/00	Received	11/01/00	Approved	10/15/01
Stage 1 DBPR	Adopted	6/00	Received	11/01/00	Approved	10/15/01
CCR	Adopted	6/00	Received	11/01/00	Approved	10/15/01
Administrative Penalty Authority	Adopted	1986	Received	11/01/00	Approved	10/15/01
Arsenic Rule	Adopted	10/02	Received	11/26/02	Approved	09/24/03
Public Notification Rule	Adopted	10/02	Received	11/26/02	Approved	09/24/03
Radionuclide Rule	Adopted	10/02	Received	11/26/02	Approved	09/24/03
Filter Backwash Recycling Rule	Adopted	10/02	Received	11/26/02	Approved	09/24/03
LT 1 Rule	Adopted	10/02	Received	11/26/02	Approved	09/24/03
New PWS Definition	Adopted	6/00	Received	11/26/02	Approved	09/24/03
Lead & Copper Rule Minor Revisions	Adopted	02/01	Received	6/26/01	Approved	09/24/03
Variance and Exemption Rule	N/A					
LT2 Enhanced Surface Water Treatment Rule			Overdue	Extension Expired on 1/04/2010		
Stage 2 DBPR			Overdue	Extension Expired on 1/05/2010		
Ground Water Rule			Overdue	Extension Expired on 11/08/2010		
Lead and Copper Rule Minor Revisions & Clarifications	Adopted	02/09	Received	10/20/09	Approved	04/26/10

Program Area	Deadline for EPA Final Approval	Draft Program Submitted		Final Program Approval	
		Projected	Actual	Projected	Actual
Capacity Development-existing systems	08/06/00		03/21/98	09/00	08/00
Operator Certification	02/05/01		06/21/99	02/01	02/01

ATTACHMENT C –FY2011 Oklahoma Violation Data and Inventory Population Served Information

Number of Systems in Violation in Oklahoma During FY 2011 (July 1, 2010 thru June 30, 2011 as of October 26, 2011) (Small <= 3,300; Medium: 3,301 - 10,000; Large >10,000)											
MCL, TT, and MRDL Violations (Health Based Standards)		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	55	19	5	2						81
	Stage 2*										
Surface Water Treatment Rule (SWTR)	SWTR										
	Long Term 1	7	4	4							15
	Long Term 2	1									1
Lead and Copper Rule											
Phase II/V	Arsenic	3	1								4
	Nitrates	21			1			6			28
	IOC	3		4	2						9
	VOC	2									2
	SOC										
Rads (Radiological)		7	2								9
Ground Water Rule (GWR)								1			1
Total Coliform Rule (TCR)		37	3	2	2			24			68
M and R and Consumer Notification Violations		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	22	6	5	1						34
	Stage 2	68	5					1			74
Surface Water Treatment Rule (SWTR)	SWTR										
	Long Term 1										
	Long Term 2	1									1
Lead and Copper Rule		236	26	4	36			5			307
Phase II/V	Arsenic	6									6
	Nitrates	3						10			13
	IOC	4									4
	VOC	6	1		3						10
	SOC	9	1	1							11
Rads (Radiological)		12									12
Ground Water Rule (GWR)		49	3	2	5			39			98
Total Coliform Rule (TCR)		244	7	3	41			218			513
Consumer Notification	CCR	143									143
	PN_rule	1									1

* There are no current MCL or TT violations for the Stage 2 Disinfection Byproducts Rule because this part of the regulations is not effective until the end of the calendar year 2012. EPA R6 is not currently tracking compliance with the MRDL requirements of the Stage 2 DBPR.

Water System Type	Primary Source Type
C- Community	GU-Ground Water under the Direct Influence of Surface Water
NC-Transient Non-Community	GUP-Purchased Ground Water under the Direct Influence of Surface Water
NTNC- Non-Transient Non-Community	SW-Surface Water
	GW-Ground Water
	GWP-Purchased Ground Water
	SWP-Purchased Surface Water

Number of Violations in Oklahoma During FY 2011
(July 1, 2010 thru June 30, 2011 as of October 26, 2011)
(Small <= 3,300; Medium: 3,301 - 10,000; Large >10,000)

MCL, TT, and MRDL Violations (Health Based Standards)		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	284	95	15	10						404
	Stage 2*										
Surface Water Treatment Rule (SWTR)	SWTR										
	Long Term 1	14	7	11							32
	Long Term 2	1									1
Lead and Copper Rule											
Phase II/V	Arsenic	15	8								23
	Nitrates	58			1			6			65
	IOC	3		4	10						17
	VOC	5									5
	SOC										
Rads (Radiological)		48	9								57
Ground Water Rule (GWR)								2			2
Total Coliform Rule (TCR)		42	3	2	2			25			74
M and R and Consumer Notification Violations		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	45	12	9	2						68
	Stage 2*	166	8					2			176
Surface Water Treatment Rule (SWTR)	SWTR										
	Long Term 1										
	Long Term 2	1									1
Lead and Copper Rule		392	29	6	50	6					483
Phase II/V	Arsenic	8									8
	Nitrates	6						14			20
	IOC	43									43
	VOC	253	42		63						358
	SOC	13	4	2							19
Rads (Radiological)		97									97
Ground Water Rule (GWR)		54	3	2	5			41			105
Total Coliform Rule (TCR)		630	8	3	74			454			1169
Notification	CCR	498						4			502
	PN rule	1									1

* There are no current MCL or TT violations for the Stage 2 Disinfection Byproducts Rule because this part of the regulations is not effective until the end of the calendar year 2012. EPA R6 is not currently tracking compliance with the MRDL requirements of the Stage 2 DBPR.

Number of Systems in Oklahoma During FY 2011 (As of October 26, 2011)														
	GU		GUP		GW		GWP		SW		SWP		Total	
	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop
C	8	41,014	6	3,667	379	576,266	96	39,505	182	2,349,026	424	523,763	1,095	3,542,286
NTNC					84	16,001	2	1,116	6	1,946	10	1,001	102	20,064
TNC			4	101	299	23,751	25	2,389	9	1,291	108	8,358	445	35,890
Total	8	41,014	10	3,768	762	616,018	123	43,055	197	2,352,263	542	542,122	1,642	3,598,240

ATTACHMENT D –Water Quality Division-Organizational Chart and District Engineer Assignments

WATER QUALITY DIVISION – ORGANIZATIONAL CHART

Division Director (1658)
 Assistant Division Director (1698) EPM IV
 Engineering Manager IV (1596)
 Environmental Programs Manager III (1369)
 Division Secretary IV (1661)
 Administrative Assistant II (1687)

Shellie Chard-McClary
 Tim Ward
 Carl Parrott
 Mark Hildebrand
 Sara Orwig
 Florence Fields

Legal Counsel – Environmental Attorneys
 Env Attorney Supervisor Mista Turner-Burgess
 Env Attorney III (0052) Sara Gibson
 Env Attorney III (0063) Karen Jayne
 Env Attorney II (0027) Ryan Haadin

Compliance Tracking
 Env. Programs Mgr. III (0103)
 David Pruitt
 Secretary II (1524)
 Cynthia Morgan

Enforcement
 Engineering Mgr. III (1642)
 Patrick Rosch
 Secretary II (0190)
 Melissa Darr

Construction & Operation
 Engineering Mgr. III (1592)
 Patty Thompson
 Secretary II (1404)
 Vacant

Permitting
 Engineering Mgr. III (1647)
 Ed Dibrberg
 Secretary II (1654)
 Alisha Barham

PWS COMPLIANCE TRACKING	WASTEWATER COMPLIANCE TRACKING	PWS ENFORCEMENT	MUNICIPAL ENFORCEMENT	INDUSTRIAL ENFORCEMENT	DWSRF	CONSTRUCTION PERMITTING	OPERATOR CERTIFICATION	WATERSHED	INDUSTRIAL PERMITS	MUNICIPAL PERMITS
Env. Prog. Mgr. II (0958) Michele Welsh	Env. Prog. Mgr. II (1638) Tom Bailey	Eng. Mgr. II (0155) Kay Coffey	Eng. Mgr. I (1598) Vacant	Eng. Mgr. II (1591) Wayne Craney	Eng. Mgr. I (1578) Rebecca Poole	Eng. Mgr. II (1590) Rocky Chen	Env. Prog. Mgr. II (1677) Chris Wisniewski	Eng. Mgr. II (1593) Mark Derichsweiler	Eng. Mgr. II (1597) Carol Paden	Eng. Mgr. I (1696) Vacant Secretary I (1656) Tammi Johnson
PE III (1615) Steve Wright EPS III (0974) Jennifer Allig EPS II (1023) Sheri McGuire EPS III (0703) Jamie Mungle EPS III (1538) David Schmitt EPS III (1021) Lynn Martin (9-1-11) EPS III (1022) Shawn Brandt (9-1-11) EPS II (0239) Vacant Adm Asst II (1555) Vacant EPS II (1695) Vacant	EPS III (0972) Karen "Margret" Boone EPS III (1003) Wayne Morey EPS III (1694) Charles Garcia EPS II (0971) Cheryl Dirck PE III (1626) Steve Webb EPS IV (1669) Sheri Tilley EPS IV (0263) Angela Ratcliff Adm Asst II (1579) Melvin Tucker Adm.Tech (1650) Vacant	PE III (1603) Don Tullius PE III (0951) Steven Hoffman EI IV (1601) Candy Thompson EI IV (0173) David Mercer PE II (1608) Dawn Hoggard Adm Asst II (1542) Ramona Haggins EI IV (1616) Brian Schwegat EI III (1715) Vacant EI I (0419) Vacant PE I (0146) Vacant PE I (1634) Vacant	EI I (1610) John Knorr EPS II (1672) "Andy" Callaway EI III (1717) Saad EI Bakouri PE III (1143) Myles Mungle EPS III (0970) Roshini Nambiar (10-18-11) EPS III (1675) Bob Battles EI III (1719) Hebrel Boktru (09-06-11) EPS III (1693) Larry Phillips EI III (1704) Pedro Grijalva EI II (1633) Travis Archer	PE III (1617) Joe Willingham PE III (0176) Jason Ma PE III (1632) Brian Clagg EI IV (1609) Winfred Lusk II EPS III (1671) Steven Gunnels EPS II (0713) Bob Giger EPS IV (1670) Carrie Evenson EPS IV (0690) Terry Hallauer Adm Asst II (1692) Kim Wyatt EPS II (1114) Michele Loudenback	PE II (1618) Gregory Carr PE II (1714) Leslie Smith EPS IV (1667) Vicki Reed EPS IV (0698) Bradley Cook EPS IV (1664) Kristi Roy PE II (1519) Candy Staring EI III (0952) Eddie Rhandour (8-1-11) EI II (0416) Gordon "Michael" Taylor Adm. Asst. I (1505) Cara Magott Adm Asst II (1330) Vivette Packhorse	PE II (1599) Gusay Kabarili PE II (1723) Duke Newin EI I (1614) Robert Walker Adm Tech II Brenda Gaylie EI I (0415) Vacant EI I (1712) Vacant	EPS II (1666) Kara Stanley EPS III (1663) Mark Kurklin Adm Asst II (1500) Debbie Segroves EPS II (1673) Vacant	PE II (1718) Karen Milford PE II (1629) Peng Yue EI II (1623) David Akakpo PE II (1720) "Andrew" Feng Fang EPS III (1665) Joe Long EPS III (0746) Elena Jigoulina EPS II (1668) Karen Miles Adm Tech III (1641) Robin Bankhead	PE II (0411) Marc Hullinger PE II (1630) Kendra Foyil PE III (1605) Michael Jordan PE II (0417) Ismael Esrar PE II (1612) Divya Bhatt PE II (1544) Kelly Pham EI I (1602) Tod Dow PE I (1607) James Grim EI I (1621) Vacant	EI III (1139) Monica Murie EI IV (1613) Vance Doan EI I (1620) Richard Percival EPS II (0996) Rebecca Marfurt PE II (1619) Mangilal "Tony" Kakani EI I (1627) Vacant

Green = Probation

Red = Vacant – Fillable

Red = Vacant – No Freeze

Purple = Trial Period

SWIP/Ties = Pins tied together

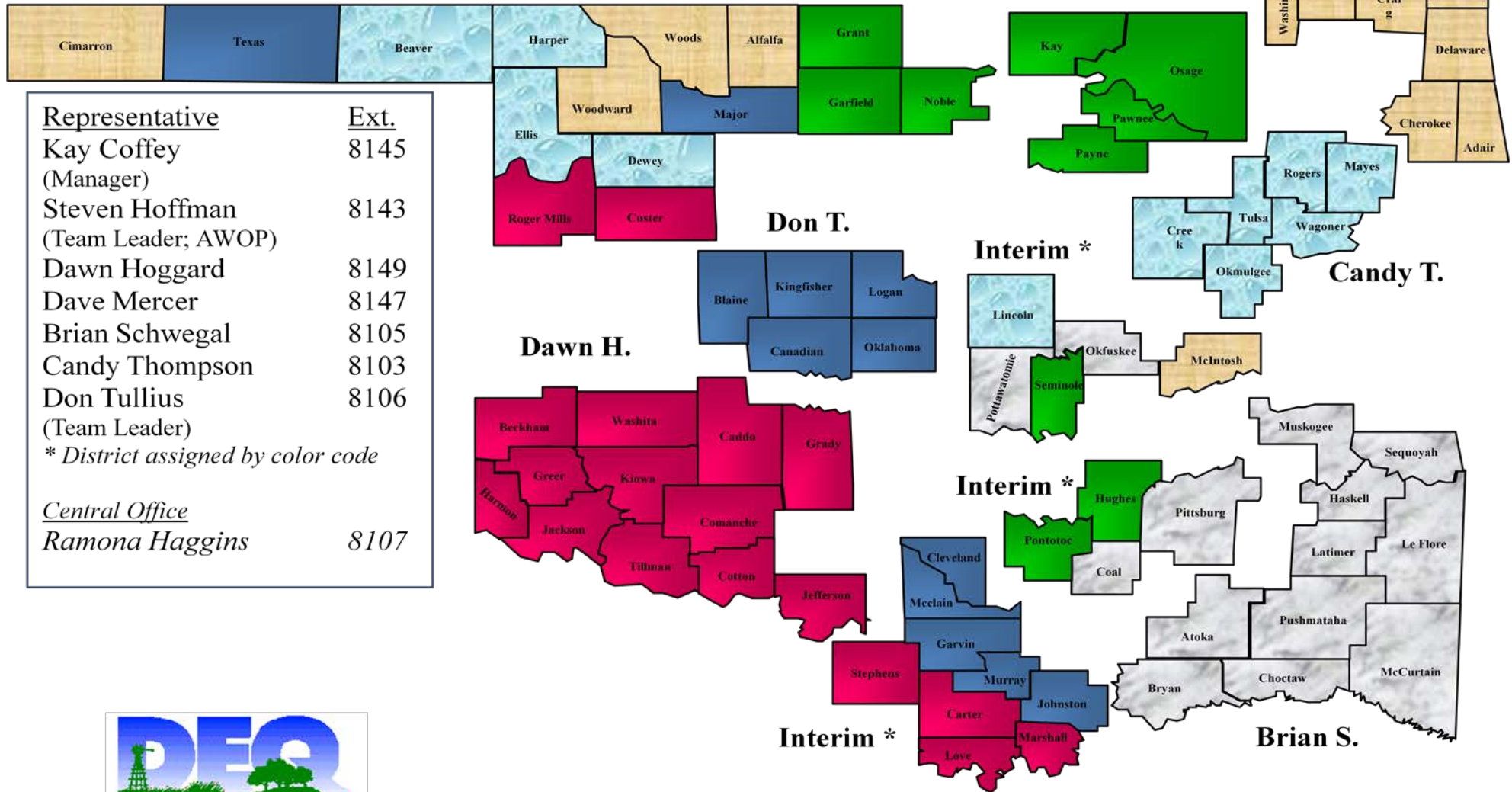
U-unclassified

Chart Revised 7-21-11

Public Water Supply Section

District Assignments (July 1, 2011)

Interim *



<u>Representative</u>	<u>Ext.</u>
Kay Coffey (Manager)	8145
Steven Hoffman (Team Leader; AWOP)	8143
Dawn Hoggard	8149
Dave Mercer	8147
Brian Schwegal	8105
Candy Thompson	8103
Don Tullius (Team Leader)	8106

** District assigned by color code*

Central Office
Ramona Haggins 8107

